

limitations. Sandler said he provided these guidelines to all finance staff and updated them periodically through written and oral briefings.

Some DNC staffers understood the quoted prohibition on taking action for donors to be quite absolute. By contrast, Fowler and some of the senior finance staff construed these rules to be essentially a prohibition on *quid pro quo* arrangements. Fowler interpreted the “in connection with a donation” language to modify all elements of the second paragraph quoted above, and stressed that literal construction of this sentence would preclude the DNC from pursuing even mundane servicing requests, like tours and photo opportunities, on behalf of donors. He also understood the White House office of political affairs to be exempted effectively from the definition of “Administration official” as used in this guideline. Sandler generally supported this reading of the text, noting that he expected Fowler would be in regular contact with the Political Affairs Office at the White House, and thus the guidelines would not apply to Fowler.

Fowler maintains that, as National Chairman, his role was to provide an interface between Party membership and the Administration, and to participate in a continuing dialogue with those constituencies on matters of policy and substance. Accordingly, in his view, the legal guidelines were addressed only to the “finance staff” and not to the Chairman. Sandler agreed with Fowler’s view that he was not a Finance staff member. Sandler also noted, though, that he did not believe it was necessary to instruct the Chairman on his proper role, as he was assumed to know and understand it.²⁶⁴

²⁶⁴Both Fowler and Sandler acknowledged, however, that on more than one occasion in 1996, Fowler was reprimanded by White House officials for making contact directly with Administration officials (other than Political Affairs’s staff) concerning matters of interest to DNC contributors.